



Lawrence Livermore National Laboratory

Environmental Protection Department

Ms. Luz Castillo, Senior Hazardous Substances Scientist Statewide Compliance Division
Department of Toxic Substances Control
700 Heinz Avenue
Berkeley, CA 94710-2737

July 26, 2004

(DATE STAMPED for July 28, 2004, mail no. 7-51)

SUBJECT:

Response to the 2004 CEI Summary of Violations Livermore Main Site (EPA ill# CA2890012584) Lawrence Livermore National Laboratory (LLNL)

Dear Ms. Castillo:

This letter is submitted as a response to the Summary of Violations (SOV), dated July 19, 2004 resulting from the Compliance Evaluation Inspection (CEI) that the Department of Toxic Substances Control (DTSC) conducted at LLNL on May 27 and 28 and June 1, 2 and 3, 2004. The SOY cited a total of six violations: two Class I violations, three Class II violations, and the final one was a minor violation that required no action by LLNL. As the SOY acknowledged, LLNL has already corrected some of the violations, and we will correct the remaining violations as soon as possible. A separate letter will be sent to DTSC to document LLNL's response to the Class I violations. This letter addresses the Class II violations, which DTSC directed to be corrected within five days. Also enclosed is the completed certification page that LLNL was required to sign and return within five days of achieving compliance. .

In response to the first Class II violation, SOY 1b, "Failure to Comply with Labeling Requirements," Radioactive and Hazardous Waste Management (RHWM) Division personnel marked the waste acceptance date of 4/1/04 on the container label of QOO088265 on the same day that this issue was identified. A copy of this label is included as attachment 1.

The waste identified in the second Class II violation, SOY 1c (plastic bottles and bags contaminated with beryllium), has been treated and no longer exists.

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Ms. Luz Castillo

Subject: Response to the 2004 CEI Summary of Violations Livennore Main Site (EPA ill# CA2890012584) Lawrence Livennore National Laboratory (LLNL)

In response to the third Class II violation, SOY 3, "Failure to Accurately Record Observations in the Inspection Log," RHWM management discussed this issue at a meeting with applicable RHWM technicians. During this meeting, the technicians were insh-ucted to note all observations (including the presence of rainwater inside a storage unit) on the inspection log along with any corrective actions needed. A record of this meeting is included as attachment 2.

Please contact me at (925) 422-3985 if you have any questions regarding this response.

ER/PY;jn

Attachments: Attachment 2: Response to: "Failure to Accurately Record Observations in the Inspection Log"
Attachment 1: Response to: "Failure to Comply with Labeling Requirements"

Sincerely,

(Original signed by Ellen Raber)

Ellen Raber Department Head